

Affidavit of Laura M. Kraemer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CONGREGATION RABBINICAL COLLEGE OF
TARTIKOV, INC., RABBI MORDECHAI BABAD, RABBI
WOLF BRIEF, RABBI HERMEN KAHANA, RABBI MEIR
MARGULIS, RABBI GERGELY NEUMAN, RABBI
MEILECH MENCZER, RABBI JACOB HERSHKOWITZ,
RABBICHAIM ROSENBERG, RABBI DAVID A. MENCZER,
RABBI ARYEH ROYDE, and KOLEL BELZ OF MONSEY,

07 Civ. 6304 (KMK)(GAY)

**AFFIDAVIT IN
OPPOSITION TO
DEFENDANTS'
MOTION TO DISMISS**

Plaintiffs,

-against-

VILLAGE OF POMONA, NY; BOARD OF TRUSTEES OF
THE VILLAGE OF POMONA, NY; NICHOLAS SANDERSON,
AS MAYOR; IAN BANKS, ALMA SANDERS ROMAN,
RITA LOUIE and BRETT YAGEL, AS TRUSTEES
AND IN THEIR OFFICIAL CAPACITIES,

Defendants.

-----X
STATE OF NEW YORK)
) ss:
COUNTY OF ROCKLAND)

Laura M. Kraemer swears under penalty of perjury:

1. I am an attorney admitted to practice in the State of New York and the United States District Court for the Southern District of New York.
2. I am an associate with the law offices of Paul Savad & Associates, attorneys for plaintiffs.
3. On April 4, 2007 I attended a meeting of the Pomona Civic Association at the Ladentown Methodist Church located in Pomona, New York.
4. Defendants Mayor Nick Sanderson ("Mayor Sanderson"), Rita Louie ("Trustee Louie") and Brett Yagel ("Trustee Yagel") were present and spoke during the meeting.

5. During the meeting, Mayor Sanderson noted that an application had not yet been filed by the Rabbinical College, but that there are certain things that the Village has to do to prepare for this "looming crisis." He stated that the Village must "seek sound legal advice, and prepare on the financial side."

6. With respect to financial preparation, Mayor Sanderson stated that the Village has the "gift of time." He also stated that he will "start recommending that money be put aside for future legal fees."

7. Mayor Sanderson stated that they retained Professor Marci Hamilton during their campaign to advise them.

8. Mayor Sanderson also stated that he does not want to make mistakes in the beginning phase that the attorneys for the developers want him to make.

9. In response to an inquiry from a member of the audience regarding whether the Village can distribute RLUIPA in layman's terms, the Mayor stated that the process moving forward will take a "long" time.

10. Trustee Yagel stated that the residents should make sure that when they speak publically that they don't speak in a discriminatory manner because that can be construed as "the village is discriminating."

11. Trustee Louie then noted "Do you see the man with the video camera at our meetings? You better believe that they will use anything you say against us so tell everyone to be careful."

12. Upon information and belief, Trustee Louie was referring to an individual that the College hired to videotape certain Village Board Meetings.

13. In response to a question by a member of the audience who inquired as to whether Village taxes would increase, Mayor Sanderson stated that the village will create a reserve, which can be done in one of two ways. They can either float a bond, or create a reserve now. He noted that there will be "3-5 years before suit commences, if ever," and that the Village will "create a legal defense fund."

14. In response to a question by a member of the audience who inquired as to the amount of money that will be necessary for the legal expenses of the Village of Pomona, Mayor Sanderson stated that "the Village may need as much as one million dollars to defend itself."

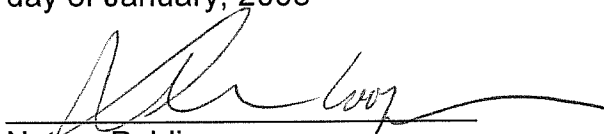
15. Mayor Sanderson also noted that the Village has "never fought a fight like this."

16. On May 1, 2007 I attended a seminar entitled "Understanding RLUIPA" presented by The Rockland Coalition for the Future. The speaker was Doris Ulman, Esq., Village Attorney for the Village of Pomona.

17. During the seminar, Ms. Ulman stated that residents should not "cave into them and sell our houses." It was evident from Ms. Ulman's speech that she was referring to the Hasidic Jewish population when she used the term "them."


LAURA M. KRAEMER

Sworn to before me on this 14th
day of January, 2008


Notary Public

SUSAN COOPER
Notary Public, State of New York
No. 4989636
Qualified in Rockland County
Commission Expires 12/16/07